

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

BRENDA STRAIT, as Personal
Representative of the Estate of Danny
Whitney, Deceased,

Plaintiff,

v.

Case No. 14-cv-00630

Hon. Paul L. Maloney

COUNTY OF GRAND TRAVERSE,
SHERIFF THOMAS BENSLEY,
DEPUTY SCOTT MARTIN,
SERGEANT ED LASSA, CORRECTIONAL
HEALTHCARE COMPANIES, INC.,
HEALTH PROFESSIONALS, LTD, P.C.,
STEPHANIE L. MILLER, LPN, and
WILFRED P. SALDANHA, MD,
Jointly and Severally,

Defendants.

VEN R. JOHNSON (P39219)
JULIANA B. SABATINI (P64367)
JOHNSON LAW, PLC
Attorneys for Plaintiff
535 Griswold, Suite 2632
Detroit, Michigan 48226
(313) 324-8300
vjohnson@venjohnsonlaw.com
jsabatini@venjohnsonlaw.com

T. JOSEPH SEWARD (P35095)
HAIDER A. KAZIM (P66146)
CUMMINGS, McCLOREY, DAVIS &
ACHO, P.L.C.
Attorneys for Defendants COUNTY OF GRAND
TRAVERSE, SHERIFF BENSLEY,
DEPUTY MARTIN and SGT. LASSA
400 W. Front Street, Ste. 200
Traverse City, MI 49684
(231) 922-1888
tjseward@cnda-law.com
hkazim@cnda-law.com

RANDALL A. JUIP (P58538)
BRIAN J. RICHTARCIK (P49390)
FOLEY, BARON, METZGER & JUIP, PLLC
Attorney for Defendants, Correctional
Healthcare Companies, Inc., Health
Professionals, Ltd, P.C., Stephanie L.
Miller, LPN and Wilfred P. Saldanha, M.D.
38777 Six Mile Road, Suite 300
Livonia, MI 48152
(734) 742-1800 / Fax (734) 521-2379
rajuip@fbmjlaw.com
brichtarcik@fbmjlaw.com

**REPLY TO DEFENDANTS, CORRECTIONAL HEALTHCARE COMPANIES, INC.,
HEALTH PROFESSIONALS, LTD, P.C., STEPHANIE L. MILLER, LPN AND
WILFRED P. SALDANHA, M.D'S AFFIRMATIVE DEFENSES**

Plaintiff, BRENDA STRAIT, as Personal Representative for the Estate of Danny Whitney, deceased, by and through their attorneys, JOHNSON LAW, PLC, for their responses to Defendants' Affirmative Defenses states as follows:

1-28. Denied.

29. Plaintiffs deny that Defendant is entitled to reserve the right to name additional affirmative defenses as they become known during the course of discovery because an attempted reservation is in contravention of Federal Court Rules.

Respectfully submitted,

JOHNSON LAW, PLC

By: /s/ Juliana B. Sabatini
VEN R. JOHNSON (P39219)
JULIANA B. SABATINI (P64367)
Attorneys for Plaintiff
535 Griswold Street, Suite 2632
Detroit, MI 48226
313.324.8300
vjohnson@venjohnsonlaw.com
jsabatini@venjohnsonlaw.com

Dated: July 22, 2014

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 22, 2014, I electronically filed the foregoing paper with the Clerk of the Court using the Court ECF system which will send notification of such filing to the following:

Randall A. Juip, Esq.
rajuip@fbmjlaw.com
Brian J. Richtarcik, Esq.
brichtarcik@fbmjlaw.com

T. Joseph Seward, Esq.
tjseward@cmda-law.com
Haider A. Kazim, Esq.
hkazim@cmda-law.com

Respectfully submitted,

JOHNSON LAW, PLC

By: /s/Juliana B. Sabatini
VEN R. JOHNSON (P39219)
JULIANA B. SABATINI (P64367)
Attorneys for Plaintiff
535 Griswold Street, Suite 2632
Detroit, Michigan 48226
313.324.8300